

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2008-196-E

In Re: Combined Application of South Carolina)	
Electric & Gas Company for a Certificate)	
of Environmental Compatibility and Public)	PETITION FOR
Convenience and Necessity and for a Base Load)	AN ORDER PERMITTING
Review Order for the Construction and Operation)	COMMENCEMENT OF
of a Nuclear Facility at Jenkinsville,)	CONSTRUCTION
South Carolina)	ACTIVITIES
_____)	

South Carolina Electric & Gas Company ("SCE&G" or the "Company") hereby petitions the South Carolina Public Service Commission (the "Commission") for an order issued pursuant to Section 58-33-110(7) of the Code of Laws of South Carolina, 1976, permitting initial clearing, excavation and construction work to begin on two 1,117 net megawatt (MW) nuclear facilities to be located at the V.C. Summer Nuclear Station ("VCSNS") site near Jenkinsville, South Carolina (the "Facilities"). This petition (the "Petition") is submitted simultaneously with the Combined Application ("Combined Application") filed pursuant to the provisions of Utility Facility Siting and Environmental Protection Act, S.C. Code Ann. §§ 58-33-10 *et seq.* (2006) (hereafter the "Siting Act") and the Base Load Review Act, S.C. Code Ann. §§ 58-33-210 *et seq.* (1976 as amended in 2007). Under the terms of Section 58-33-110(7) of the Code of Laws of South Carolina 1976, the Commission may issue the requested Order if it finds that permitting initial

clearing, excavation and construction work of a major facility is “justified by public convenience and necessity.”

If the permission for the initial clearing, excavation and construction work is granted, SCE&G will proceed with these activities at its own risk and in compliance with all applicable environmental and land-use requirements imposed by law. SCE&G recognizes that under the statutes cited above, the requested permission, if granted, “shall not in any way indicate approval by the Commission of the proposed site or facility.” S.C. Code Ann. § 58-33-110(7)(2006).

In support of this Petition, SCE&G would respectfully show to the Commission:

1. The Combined Application. The Combined Application contains an extensive statement of the facts related to SCE&G, its electric service system, and other matters related to the construction of the Facilities. The contents of the Combined Application and its exhibits are incorporated into this Petition by reference.

2. Description of the Facilities and Basis for Selection. To meet the growing demands of its customers for electric power, to support the continued economic development and prosperity of the State of South Carolina, and to maintain the reliability of its electric system, SCE&G proposes to construct two Westinghouse AP1000 Advanced Passive Safety Power (“AP1000”) Plants in Jenkinsville, South Carolina. The plants will be located adjacent to and approximately one mile southwest of the present 966 megawatts (MW) Westinghouse reactor at the site and will be jointly owned by SCE&G and the South Carolina Public Service Authority (“Santee-Cooper”). A consortium of Westinghouse Electric Co., LLC (“Westinghouse”) and Stone & Webster, Inc., (“Stone & Webster”) has contracted with SCE&G to construct the Facilities.

3. The Need for the Facilities. The anticipated net dependable capacity from the Facilities (VCSNS Units 2 & 3) will be approximately 2,234 MW of which 1,228 MW will be available to serve customers of SCE&G pursuant to its agreement with Santee-Cooper. Westinghouse and Stone & Webster have committed to complete construction of VCSNS Unit 2 by April 1, 2016, which is before the start of the summer peak period for electric demand on SCE&G's system. As indicated on Exhibit H to the Combined Application, if VCSNS Unit 2 is not available in the summer of 2016, SCE&G's reserve margin will drop to 2.0% compared to its target margin of 12%-18%. A reserve margin in the range of 2.0% is insufficient to allow SCE&G to maintain the reliability of its system and to meet its reserve sharing obligations to other utilities.

4. Need to Commence Site and Construction Work. Under the terms of the Base Load Review Act, the order in the Combined Application proceeding is due to be issued in February of 2009. Westinghouse and Stone & Webster may not be able to meet their completion deadlines for VCSNS Unit 2 unless site work and initial construction is underway before then.

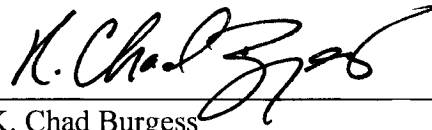
5. Replacement of the VCSNS Unit 1 Transformer. An additional reason that SCE&G seeks authorization to commence work on the site is the fact that SCE&G is scheduled to replace the main step-up transformer at VCSNS Unit 1 during its Refueling Outage 18 which is scheduled for the fall 2009. The existing transformer has been in service for over 25 years and requires replacement for reasons of reliability. Due to the size and weight of the new transformer, the only practical and efficient means to deliver the transformer to the site is by rail. The rail line serving VCSNS Unit 1 must be dismantled to permit clearing and grading of the site for Units 2 & 3, and rebuilt on a the new site contours. Clearing and grading for Units 2 & 3

must being very shortly if the rail line is to be available for delivery of the replacement of this transformer as scheduled.

6 The Lynch and Torres Affidavit. The Affidavits of Mr. Alan Torres and Dr. Joseph M. Lynch, attached hereto as Exhibit A, are incorporated herein by reference and confirm the above facts.

WHEREFORE, South Carolina Electric & Gas Company respectfully requests that the Commission take up these matters without hearing as permitted by statute and issue SCE&G permission to conduct initial clearing, excavation and construction work at the at the site specified in the Combined Application in this docket, at its own risk, and without prejudice to the other matters to be determined in this docket, pending the issuance of the order requested in that Combined Application.

Respectfully submitted.



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Attorneys for the Applicant

Date: May 30, 2008.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2008-196-E

In Re: Combined Application of South Carolina)	AFFIDAVIT OF DR. JOSEPH M.
Electric & Gas Company for a Certificate)	LYNCH IN SUPPORT OF
of Environmental Compatibility and Public)	THE PETITION FOR
Convenience and Necessity and for a Base Load)	AN ORDER PERMITTING
Review Order for the Construction and Operation)	COMMENCEMENT OF
of a Nuclear Facility at Jenkinsville,)	CONSTRUCTION
South Carolina)	ACTIVITIES
_____)	

Personally appeared before me, the undersigned Dr. Joseph M. Lynch, who being duly sworn, deposes and states as follows:

1. I am Dr. Joseph M. Lynch, Manager of Resource Planning, SCANA Services, Inc.
I am of legal age and fully competent to testify to the matters contained in this affidavit.
2. In my role as Manager of Resource Planning, I am familiar with the need for the construction of the two 1,117 net megawatt (MW) nuclear facilities to be located at the V.C. Summer Nuclear Station site near Jenkinsville, South Carolina ("VCSNS Units 2 & 3").
3. South Carolina Electric & Gas Company ("SCE&G" or the "Company") has petitioned the South Carolina Public Service Commission (the "Commission") for an order permitting initial clearing, excavation and construction work to begin on the site where VCSNS Units 2 & 3 will be constructed.

4. As indicated in the Combined Application and Exhibits filed in this proceeding, SCE&G's customers will need the capacity represented by VCSNS Unit 2 to be available for the 2016 summer peak period for electrical demand. It would be in the best interest of SCE&G's customers for initial clearing, excavation and construction work to begin so as not to risk delaying the availability of the power from that unit.

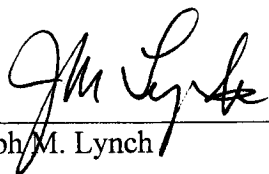
5. I understand that an additional reason that SCE&G seeks authorization to commence work on the site is the fact that SCE&G is scheduled to replace the main step-up transformer at VCSNS Unit 1 in the fall 2009. I understand too that a rail line located on the site of VCSNS Units 2 & 3 must be rebuilt and available for delivery of the replacement of this transformer before then.

6. The power that VCSNS Unit 1 generates is of great importance to the economy and reliability of SCE&G's electric system and anything that could hamper or jeopardize that reliability should be avoided.

7. I have reviewed the matter contained in the Combined Application and Exhibits and all factual statements concerning SCE&G's need for future power and energy to serve its customers are true to the best of my knowledge.

8. If the Commission requires additional information concerning these matters, I would be happy to provide it.

FURTHER DEPONENT SAITH NOT:



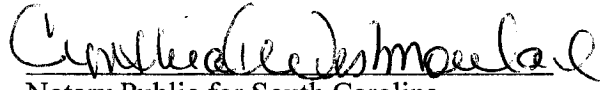
Dr. Joseph M. Lynch

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

A C K N O W L E D G M E N T

I, the undersigned Notary Public, do hereby certify that Dr. Joseph M. Lynch personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal this 30th day of May, 2008.


Notary Public for South Carolina
My Commission Expires: 9 - 13 - 2011

Date: May 30, 2008.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA
DOCKET NO. 2008-196-E

In Re: Combined Application of South Carolina)	AFFIDAVIT OF ALAN TORRES
Electric & Gas Company for a Certificate)	IN SUPPORT OF THE
of Environmental Compatibility and Public)	PETITION FOR
Convenience and Necessity and for a Base Load)	AN ORDER PERMITTING
Review Order for the Construction and Operation)	COMMENCEMENT OF
of a Nuclear Facility at Jenkinsville,)	CONSTRUCTION
South Carolina)	ACTIVITIES
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Personally appeared before me, the undersigned Alan Torres, who being duly sworn,
deposes and states as follows:

1. I am Alan Torres, Manager, Construction for V.C. Summer Nuclear Station Units
- 2 & 3. I am of legal age and fully competent to testify to the matters contained in this affidavit.
 2. In my role as Construction Manager, I am familiar with the requirements and schedules related to the construction of the two 1,117 net megawatt (MW) nuclear facilities to be located at the V.C. Summer Nuclear Station site near Jenkinsville, South Carolina (the "Facility").
 3. South Carolina Electric & Gas Company ("SCE&G" or the "Company") has petitioned the South Carolina Public Service Commission (the "Commission") for an order permitting initial clearing, excavation and construction work to begin on the site.

4. If the requested permission is granted, SCE&G is prepared to proceed with the construction activities at its own risk and in compliance with all applicable environmental and land-use requirements imposed by law.

5. SCE&G recognizes that under the statutes cited above, if the requested permission is granted, it does not in any way indicate approval by the Commission of the proposed site or facility.

6. As indicated in the Affidavit of Dr. Joseph M. Lynch which is also being supplied to the Commission, SCE&G will need the capacity represented by the Facility to be available for the summer peak period in 2016. However, it is my understanding that under the terms of the Base Load Review Act, the final order allowing approving construction for the Facility is not due to be issued until February of 2009. Our principal contractors and suppliers, Westinghouse and Stone & Webster cannot meet their completion deadlines for VCSNS Unit 2 unless site work and initial construction is underway before then. Delaying the start of this initial clearing, excavation and construction work would only place additional pressure on the construction schedule and risk delays and increased costs for the work.

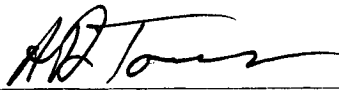
7. An additional reason that SCE&G seeks authorization to commence work on the site is the fact that SCE&G is scheduled to replace the main step-up transformer at VCSNS Unit 1 during Refueling Outage 18 at that unit which is scheduled for the fall 2009. The existing transformer has been in service for over 25 years and requires replacement for reasons of reliability. The most practical and efficient means to deliver the new transformer to the site is by rail. To permit clearing and grading of the site for Units 2 & 3, the rail line serving VCSNS Unit 1 must be dismantled and rebuilt once the new site contours are established. Clearing and

grading for Units 2 & 3 must being very shortly for the rail line to be available for delivery of this replacement transformer as scheduled.

8. I have reviewed the petition in this matter and all factual statements concerning the need to commence initial clearing, excavation and construction work on the site are true to the best of my knowledge.

9. If the Commission requires additional information concerning these matters, I would be happy to provide it.

FURTHER DEPONENT SAITH NOT:



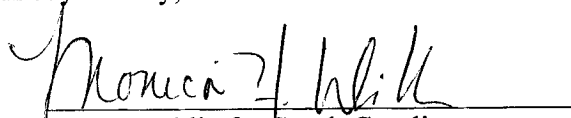
Alan Torres

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND)

ACKNOWLEDGMENT

I, the undersigned Notary Public, do hereby certify that Alan Torres personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal this 30th day of May, 2008.


Notary Public for South Carolina
My Commission Expires: 11/15/2009

Date: May 30, 2008.